

How is an EMR performed?

An EMR is performed by an EMR team, which visits a facility to conduct the evaluation. The EMR team examines the facility's environmental documentation to understand how the management system is designed. Then, they interview the facility's personnel to understand how the EMS actually works in practice. Team members next evaluate what they have observed by comparing it to one of the EPA-recognized EMS guidelines. For example, the *Generic Protocol for Conducting Environmental Audits at Federal Facilities* examines seven criteria, which are:

- ◆ Organizational Structure;
- ◆ Environmental Commitment;
- ◆ Formality of Environmental Programs;
- ◆ Internal and External Communications;
- ◆ Staff Resources, Training, and Development;
- ◆ Program Evaluation, Reporting, and Corrective Action; and
- ◆ Environmental Planning and Risk Management.

EPA also recognizes the *Code of Environmental Management Principles* for Federal Agencies (CEMP) and the National Enforcement Investigations Center's (NEIC) Compliance-Focused Environmental Management System - Enforcement Agreement Guidance guidelines.

For further information on EMRs please see the following websites:

<http://www.epa.gov/emr/guidance.html>

<http://www.epa.gov/oeca/cemp/ceмпtoc.html>

<http://www.epa.gov/oeca/fedfac/complian/mainintro.html>

<http://www.epa.gov/oeca/fedfac/fflex.html>

How do I get an EMR performed at my facility?

For further information, or to schedule an EMR at your facility, please contact your EPA Federal Facility Coordinator:

Anne H. Fenn
US EPA Region I
One Congress St.-Suite 1100
Mail: SPP
Boston, MA 02114-2023
Tel: 617-918-1805
Fax: 617-918-1810
fenn.anne@epa.gov

Bill Arguto
US EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Tel: 215-814-3367
Fax: 215-814-2783
arguto.william@epa.gov

Lee Regner
US EPA Region V
77 West Jackson Blvd.
Chicago, IL 60604
Tel: 312-353-6478
Fax: 312-353-5374
regner.lee@epa.gov

Diana Jackson
US EPA Region VII
901 N. 5th St.
Mail: RA/ECO
Kansas City, KS 66101
Tel: 913-551-7744
Fax: 913-551-7944
jackson.diana@epa.gov

Sara Segal
US EPA Region IX
75 Hawthorne St., CMD-2
San Francisco, CA 94105
Tel: 415-744-1569
Fax: 415-744-1598
segal.sara@epa.gov

Kathleen Malone
US EPA Region II
290 Broadway - 21th Fl.
New York, NY 10007
Tel: 212-637-4083
Fax: 212-637-4008
malone.kathleen@epa.gov

Stacy Gent-Howard
US EPA Region IV
61 Forsyth St., SW
Atlanta, GA 30303
Tel: 404-562-9633
Fax: 404-562-9598
howard.stacy@epa.gov

Joyce Stubblefield
US EPA Region VI
Mail: 6EN-XP
1445 Ross Ave.
Dallas, TX 75202
Tel: 214-665-6430
Fax: 214-665-7446
stubblefield.joyce@epa.gov

Dianne Thiel
US EPA Region VIII
999 18th St. - Ste. 500
Mail: 8P-P3T
Denver, CO 80202-2466
Tel: 303-312-6389
Fax: 303-312-6044
thiel.dianne@epa.gov

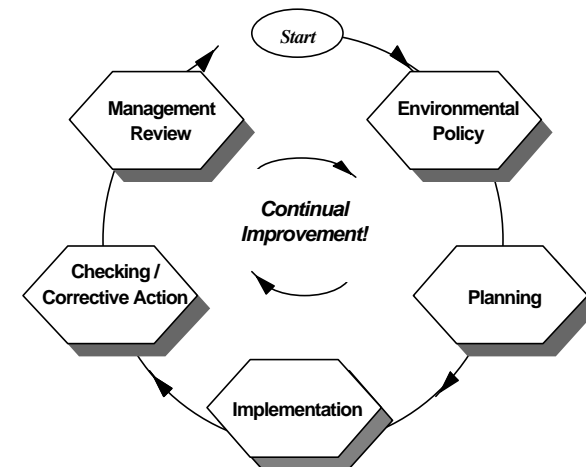
Michele Wright
US EPA Region X
1200 6th Ave., OEC-164
Seattle, WA 98101
Tel: 206-553-1747
Fax: 206-553-7176
wright.michele@epa.gov

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Environmental
Protection Agency

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Environmental Management Reviews at Federal Facilities



U.S. EPA Federal Facilities Enforcement Office

What is an EMS?

An Environmental Management System (EMS) is a system that helps an organization develop, implement, achieve, and maintain a successful environmental policy. All organizations, federal facilities included, have an obligation to preserve the environment and its resources for future generations. An EMS helps facilities meet this responsibility through planning, tracking, and continually improving environmental performance.

An EMS is designed to increase the efficiency of an organization's processes, increase the effectiveness of its environmental program, and strengthen its environmental credibility with customers, governments, and communities.

What common EMS challenges do federal facilities face?

As highlighted in the EMR National Report, staff at federal facilities face a variety of challenges in developing and implementing EMSs at their facilities. Some of these problems include:

- ✓ Lack of adequate environmental staff;
- ✓ Lack of annual training plans and mechanisms to track individual training needs and accomplishments;
- ✓ Lack of clear EMS policies, goals, objectives, and targets;
- ✓ Failure to communicate "lessons learned" to other federal facilities; and
- ✓ Lack of opportunity to gather ideas and feedback from other departments or groups.

What is an EMR?

The Environmental Protection Agency's (EPA) Guidance of Federal Facility EMRs defines an Environmental Management Review (EMR) as "a review of an individual facility's program and management systems to determine the extent to which a facility has developed and implemented specific environmental protection programs and plans which, if properly managed, should ensure compliance and progress towards environmental excellence." An EMR is a compliance assistance tool, similar to Pollution Prevention Opportunity Assessments and Compliance Audits. However, instead of focussing on manufacturing processes, regulatory requirements, or waste streams, the EMR focuses on a facility's environmental management systems.

"Preparation for the review caused us to take hard look at our compliance to a diverse number of environmental areas. As the Safety Manager, the process was also a useful tool to educate top management concerning an area about which they have very little knowledge or experience. I would recommend the process to any of our Safety Managers in the system."
- **Facility Safety/Environmental Mgr.**

Why would you want to have an EMR done at your facility?

There are many benefits to having an EMR performed at a facility. Several of the most pronounced benefits are:

- ✓ It is a collaborative and inexpensive means to enhance a facility's EMS;
- ✓ An outside party can discover issues overlooked by busy facility staff;
- ✓ EPA's regulatory and technical environmental expertise is made available to the facility;

- ✓ The facility receives EPA's ability to facilitate root cause analysis;
- ✓ It can lead to improved environmental compliance and more efficient and effective environmental management;
- ✓ It provides feedback on the effectiveness of a facility's system, benchmarks the facility's performance, and identifies opportunities for improvement;
- ✓ EPA generally will not conduct inspections at the facility for at least six months after an EMR is done; and
- ✓ For any compliance problems or violations discovered during an EMR, the Incidental Violations Response Policy governs EPA's response.

What federal agencies have had EPA conduct EMRs at their facilities?

- Bureau of Indian Affairs
- Bureau of Prisons
- Coast Guard
- Department of Agriculture
- Department of Defense (Air Force; Army; Army Corps of Engineers; Army National Guard; Navy)
- Department of Energy
- Department of the Treasury
- Environmental Protection Agency
- Federal Aviation Administration
- Federal Emergency Management Agency
- Fish & Wildlife Service
- National Aeronautics & Space Administration
- National Park Service
- U.S. Postal Service
- U.S. Mint
- Veteran's Health Administration

"The EMR is also a good program to receive a friendly environmental management audit, which ultimately will help the facility's environmental programs succeed."
- **Facility Environmental Mgr.**